

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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My Pillow, Inc.; Michael J. Lindell; Mike  
Lindell Products LLC; Lindell Media LLC;  
Lindell Technologies, LLC; Lindell  
Properties, LLC; Lindell Publishing, LLC;  
Lindell Services, LLC; Lindell  
Management, LLC; Prior Lake 40 Acres,  
LLC; and Lindell-TV LLC,

Civ. No.: 24-CV-04535 (JMB/TNL)

Plaintiffs,

**MEET AND CONFER STATEMENT**

v.

Lifetime Funding, LLC; FunderZgroup,  
LLC; Michael Kandkhorov; Michael Kand;  
Abe Kand; Tiffany Johnson; Sam  
Hernandez; Alan Hernandez; CapShot  
Financial; and John and Jane Does,

Defendants.

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I, Richard R. Voelbel, representing Defendants Lifetime Funding, LLC, FunderZgroup, LLC, Michael Kandkhorov, Michael Kandhorov (a/k/a Michael Kand), and Abraham Kandhorov (a/k/a Abe Kand), certify that, pursuant to Local Rule 7.1(a), counsel for the parties met and conferred regarding Defendants' Motion to Dismiss on December 19, 2024. The parties were unable to agree to resolution of any part of the motion.

Dated: January 23, 2025

**FELHABER LARSON**

By: /s/ Richard R. Voelbel  
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Kandkhorov, Michael Kandhorov (a/k/a  
Michael Kand), and Abraham Kandhorov  
(a/k/a Abe Kand)*